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15 (ADDITIONAL COUNSEL LISTED ON THE  
FOLLOWING PAGE)

20 PEPPERDINE UNIVERSITY,

21 Plaintiff,

22 ||

23 NETFLIX, INC. and WARNER BROS.  
ENTERTAINMENT INC.

24 Defendants.

Case No. 2:25-cv-01429

**JOINT STIPULATION  
REGARDING DEADLINES FOR  
PLAINTIFF'S FORTHCOMING  
AMENDED COMPLAINT AND  
DEFENDANTS' MOTION TO  
DISMISS**

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## **JOINT STIPULATION**

Plaintiff Pepperdine University (“Plaintiff”) and defendants Netflix, Inc. and Warner Bros. Entertainment Inc. (“Defendants”), by and through their respective attorneys, hereby stipulate to the following deadlines regarding Plaintiff’s forthcoming amended complaint and Defendants’ forthcoming motion to dismiss the amended complaint:

WHEREAS, the parties met and conferred, and plaintiff Pepperdine University (“Plaintiff”) indicated that it intends to file a First Amended Complaint;

WHEREAS, Defendants' current deadline to respond to the Complaint (Docket No. 1) is March 14, 2025;

WHEREAS, Plaintiff agreed that, to preserve the parties' and the Court's resources, defendants Netflix, Inc. and Warner Bros. Entertainment Inc.

(“Defendants”) need not file a response to the Complaint (Docket No. 1);

WHEREAS, the parties agreed to stipulate to the deadlines for Plaintiff's forthcoming amended complaint and Defendants' anticipated motion to dismiss amended complaint;

**ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED  
THAT:**

1. Defendants need not file a response to the complaint at Docket No. 1;
2. Plaintiff shall file an amended complaint on or before March 28, 2025;
3. Defendants shall file their motion to dismiss the amended complaint on or before April 18, 2025, noticing it for hearing on May 30, 2025;
4. Plaintiff shall file any opposition to Defendants' motion to dismiss on or before May 9, 2025; and
5. Defendants shall file any reply in support of their motion to dismiss on or before May 16, 2025.

1  
2 Dated: March 13, 2025

By: /s/ Matthew T. Kline

3  
4 Daniel M. Petrocelli  
Matthew T. Kline  
Amy R. Lucas  
5 O'MELVENY & MYERS LLP

6 -and-

7 James D. Weinberger  
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8 FROSS ZELNICK LEHRMAN & ZISSU,  
P.C.  
9 (admitted pro hac vice)

10 Attorneys for Defendants Netflix, Inc. and  
11 Warner Bros. Entertainment Inc.

12 Dated: March 13, 2025

By: /s/ Aviv S. Halpern

13 Andrei Iancu  
14 Robert A. Sacks  
15 Emily Olsen  
16 Aviv S. Halpern  
SULLIVAN & CROMWELL LLP

17 -and-

18 Daniel M. Cislo  
Katherine M. Bond  
19 CISLO & THOMAS LLP

20 Attorneys for Plaintiff Pepperdine University

## **SIGNATURE ATTESTATION**

I hereby attest that the other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 13, 2025

By: /s/ Matthew T. Kline

Matthew T. Kline

O'MELVENY & MYERS LLP

*Attorneys for Defendants Netflix, Inc. and Warner Bros. Entertainment Inc.*